

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

ALEXUS WILLIAMS, AS
SURVIVING NEXT OF KIN OF
DEWAYNE WILLIAMS,

Plaintiff,

v.

JAY E. JOHNSON; MARK
LEGARDA; MARTIN RUSSO;
MATTHEW EAST; DOUG
BONDAR; MARK BARNES;
NANCY LIVINGSTON; KENDALL
PATIENT RECOVERY U.S., LLC;
KPR U.S. LLC; CARDINAL
HEALTH, INC. and JOHN DOE NOS.
1-10

Defendants.

Case No. 1:23-cv-04927-ELR

**STIPULATED MOTION FOR EXTENSION
TO RESPOND TO COMPLAINT**

Defendants KPR U.S., LLC/Kendall Patient Recovery U.S., LLC, Cardinal Health, Inc., Mark Legarda, Martin Russo, Mark Barnes, Nancy Livingston, Jay E. Johnson, Matthew East, and Doug Bondar (“Defendants”) respectfully move for an extension to respond to Plaintiff’s complaint. (Doc. 1-1.) As fully set forth in the following memorandum, Defendants seek an extension until fourteen (14) days after resolution of the pending motion to transfer venue (Doc. 5) and Plaintiff’s forthcoming motion to remand. Defendants’ current deadline to respond to the complaint is November 2. Counsel for Defendants and Plaintiff have conferred and stipulate to the requested extension.

Respectfully submitted this 31st day of October, 2023.

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Kendall Patient Recovery U.S., LLC, KPR
U.S., LLC, Cardinal Health, Inc., Mark
Legarda, Martin Russo, Mark Barnes and
Nancy Livingston

RULE 7.1(D) CERTIFICATE

The undersigned counsel certifies that this document has been prepared with Times New Roman 14-point font in accordance with Local Rule 5.1.C.

This 31st day of October, 2023.

/s/ Matthew D. Thurlow
Matthew D. Thurlow

CERTIFICATE OF SERVICE

I hereby certify that on this day, I caused a true and correct copy of the foregoing **Stipulated Motion for Extension to Respond to Complaint** to be electronically filed and served upon all counsel of record through the Court's electronic filing system and through electronic mail as follows:

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This 31st day of October, 2023.

/s/ Matthew D. Thurlow

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